

US Environmental Protection Agency
Region 6
Fiscal Year 2014 Program Review
For the
Arkansas Department of Health - Engineering Section
Public Water System Supervision (PWSS)

Review Conducted by
EPA Region 6
Source Water Protection Branch
Drinking Water Section

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I. Introduction

This report reviews the Arkansas Department of Health's (ADH) Public Water Supply Supervision (PWSS) Program under the Safe Drinking Water Act (SDWA). Title 40 of the Code of Federal Regulations (40 C.F.R.) part 142.17 (a)(1) states: "At least annually the Administrator shall review, with respect to each State determined to have primary enforcement responsibility, the compliance of the State with the requirements set forth in 40 C.F.R. part 142, subpart B, and the approved State primacy program." This report summarizes the required primacy End-of-Year (EOY) review of the Arkansas Department of Health's Engineering Section's Public Water Supply Supervision Program by the United States Environmental Protection Agency's (EPA) Region 6 Source Water Protection Branch, Drinking Water Section for Fiscal Year 2014.

The ADH program elements, which were previously adopted by the State and approved by EPA to meet 40 C.F.R. 142.10 primacy requirements, are examined as well as State activities to meet new primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act. This report also documents ADH's initiatives, activities, and achievements undertaken to meet and/or exceed the national drinking water standards. EPA will continue to work in partnership with ADH to strengthen the PWSS program, enhance program efficiency and compliance determination, and assure public health protection to Arkansans' access to cost effective and superior quality drinking water.

II. Background

The PWSS Program Review EOY meeting was conducted via teleconference from the EPA Region 6 program office in Dallas, Texas, with participation from ADH staff members calling in from Little Rock, Arkansas, on December 18, 2014. Updates that occurred after December 18, 2014, will be noted in *italics* in this report.

Tables 1A and 1B lists the meeting attendees.

ADH PWSS Program Review Attendee Table: (Table 1A-ADH Staff)

Name	Title	Email	Phone
Jeff Stone	Director, Engineering Section	Jeffery.Stone@arkansas.gov	501-661-2693
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Teresa Lee	Engineer Supervisor	Teresa.Lee@arkansas.gov	501-661-2623
Martin Nutt	Certification Officer/Training	Martin.Nutt@arkansas.gov	501-661-2504

Name	Title	Email	Phone
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Craig Corder	Engineering Supervisor	Craig.Corder@arkansas.gov	501-661-2623
Amelia Trimble	Budget Analyst	Amelia.Trimble@arkansas.gov	501-661-2620
Robin Michaels	Compliance and Enforcement Officer	Robin.Michaels@arkansas.gov	501-661-2172
Ken Bown	Source Protection Program Supervisor	Ken.Bown@arkansas.gov	501-661-2623

ADH PWSS Program Review Attendee Table: (Table 1B-EPA R6 Staff)

Name	Title	Email	Phone
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Andrew Waite	Environmental Engineer	Waite.Andrew@epa.gov	214-665-7332
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Nancy Ho	Environmental Scientist	Ho.nancy@epa.gov	214-665-3179
Mike Bechdol	Environmental Scientist	Bechdol.michael@epa.gov	214-665-7133
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III. Arkansas Drinking Water System Universe

A Public Water System (PWS) is defined as a system that provides water for human consumption through pipes or other constructed conveyances to at least 15 service connections or serves an average of at least 25 people for at least 60 days a year. EPA has defined three types of public water systems:

1. Community Water Systems (CWS): A public water system that regularly supplies water to at least 25 year-round residents or to at least 15 service connections.
2. Non-Transient Non Community Water System (NTNCWS): A public water system that is not a community water system and that regularly supplies water to at least 25 of the same people at least six months of the year. Some examples are schools, factories, office buildings, and hospitals which have their own water systems.
3. Transient Non-Community Water System (TNCWS): A non-community water system that does not regularly serve at least 25 of the same persons over six months of the year such as gas stations or campgrounds.

The typical PWS sources in Arkansas are ground water, purchased ground water, surface water, purchased surface water, ground water under the direct influence of surface water, and purchased ground water under the influence of surface water.

The EPA water system size classifications used in this report are based on the following:

Small systems serve 25 to 3,300 people
Medium systems serve 3,301 to 10,000 people
Large systems serve more than 10,001 people

According to the Federal Safe Drinking Water Information System's (SDWIS FED) frozen data as of October 2014, the State of Arkansas has a total of 1,063 PWSs serving 3,301,615 people as illustrated in the following Arkansas PWS Population Table (Table 2). Compared to last year (FY 2013), FY 2014 has shown a slight reduction in the number of public water systems that can be attributed to consolidation of water systems among the transient systems.

Table 2

Arkansas PWS Population Table

State	Type	GU		GUP		GW		GWP		SW		SWP		Total Sys	Total Pop
		Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop		
AR	C	3	7,732			322	820,227	77	71,064	71	1,407,165	228	963,152	701	3,269,340
	NTNC					30	8,786	1	214			4	3,083	35	12,083
	TNC	7	576	1	30	163	14,796	40	1,195	11	440	105	3,155	327	20,192
AR Total		10	8,308	1	30	515	843,809	118	72,473	82	1,407,605	337	969,390	1,063	3,301,615

GU = Ground Water Under the Direct Influence of Surface Water
 GUP = Ground Water Under the Direct Influence of Surface Water Purchased
 GW = Ground Water
 GWP = Ground Water Purchased
 SW = Surface Water
 SWP = Surface Water Purchased

C = Community Water System
 NTNC = Non Transient Non Community
 TNC = Transient Non Community

IV. Primacy Program Summary

A. Organizational Structure

The primacy program for the State of Arkansas' Drinking Water Program is housed within the Arkansas Department of Health's Center for Local Public Health Environmental Health Branch's Engineering Section under the direction of Mr. Jeff Stone, P.E. Under the Field Surveillance Group, the State of Arkansas is divided into 9 engineering districts. The management roles within the Engineering Section are described below:

Mr. Jeff Stone, P.E.	Director, Engineering Section
Mr. Lance Jones, P.E.	Chief Engineer
Mr. Lyle Godfrey, P.E.	Chief, Technical Support
Mr. A. Martin Nutt	Water Operator Certification Officer
Mr. Gregory Treadway	Information Systems Supervisor
Ms. Amelia Trimble	Supervisor, Administrative Support
Ms. Robin Michaels	EHS Compliance Officer

B. Staffing Needs / Outsourcing Activities

ADH is currently authorized for 73 positions within the Engineering Section. Due to the current economic climate within the State of Arkansas, ADH does not foresee any growth of the Engineering Section with the addition of new staff. At the present time, the Engineering Section has 72 filled positions and one Engineering vacancy in District 6.

ADH continues to have difficulty in filling some open positions due to the issues associated with ADH hiring procedures, as well as ADH's entry level salaries. At times, ADH must re-advertise a position more than once before finding a suitable applicant that would accept the State's entry level salary. Overall, this process can take anywhere from two to three months and has been most noticeable in the hiring categories for engineers, environmental health specialists, and geographic information system specialists.

Should a need arise to save positions within the Engineering Section, a potential approach may be to consolidate from nine engineering districts to eight.

At the management level of the ADH Engineering Section, there are no immediate plans by Mr. Stone, Mr. Jones, or Mr. Godfrey to retire or leave the agency in FY 2015.

C. Sample Collection, Analysis, and Laboratory Certification

The ADH Engineering Section has five drinking water samplers that collect drinking water compliance samples from ADH regulated drinking water systems. These samplers assist the program in achieving a near 100% compliance rate for samples collected by the State. In Arkansas, the ADH drinking water samplers are tasked to collect all organic, inorganic, radionuclide, and special samples such as UCMR3. The samples that the water system operator is tasked with taking are lead and copper, fluoride, and bacteriological samples. The only samples that are contracted out to a private laboratory are analyses for *Cryptosporidium* under the Long Term 2 Enhanced Surface Water Treatment Rule.

For the inorganic analyses, the laboratory is conducting these analyses in batches and analyzing the samples very near the maximum holding times. As a result of this practice, delays in the reporting of these results have occurred.

In FY 2014, the ADH Engineering Section was able to provide financial grant assistance to the ADH laboratory towards the purchase of analytical equipment needed for UCMR analyses. ADH is awaiting approval of the State Revolving Funds 2014 work plan before proceeding with the purchase of laboratory equipment to replace aging/out of maintenance equipment such as the gas chromatograph/mass spectra for EPA Method 524.2 and the high performance liquid chromatography for EPA Method 531.2.

The ADH drinking water laboratory's EPA laboratory accreditation is current until February 28, 2016 and a laboratory certification audit is currently scheduled for Fall 2015 by EPA Region 6.

D. ADH Public Water System Fee Program

ADH continues to rely on public water system service fees and Drinking Water State Revolving Fund (DWSRF) Set Asides to properly staff the State's drinking water program. No new additional revenue streams are anticipated in 2015 to assist the program; however, program costs are expected to rise in the upcoming years. The Public Water System Service Fee is used to provide assistance to public water systems for the purpose of ensuring compliance with the Safe Drinking Water Act such as water sample collection, laboratory analysis, and required reporting of results to the EPA. In addition, the fee also assists with program staff salaries, water operator training, capital equipment, travel, public education, and well head protection services. The fee currently generates \$4.1 million per year.

The last fee increase was in 2007 where the fee was increased from \$0.25 to \$0.30 per meter. Drinking water industry representatives in Arkansas understand that a fee increase may be warranted in the future to keep the drinking water program and public health laboratory running effectively as new drinking water rules and regulations take hold.

E. Legislative Updates

Act 197 requires public water systems serving a total population of 5,000 or more persons to fluoridate. In 2014, there were 89 Arkansas water systems that added fluoride to their drinking water which covered about 72% of the state's population. In 2015, it is anticipated that another 14 water systems will begin fluoridation.

At the time of this end of year conference call, no bills regarding drinking water were introduced to the 90th General Assembly for the Arkansas State Legislature's Regular Session 2015 that convenes on January 12, 2015.

V. Program Initiatives

A. Small Systems Assistance (Capacity Development)

Within the State of Arkansas, small community water systems need additional assistance to understand and implement EPA drinking water rules, maintain compliance, address drinking water quality concerns, and system maintenance. To assist these small water systems, ADH relies on four technical services contracts that target capital development of public water systems. These contracts focus on the following:

1. Financial and Management needs (Arkansas Rural Water)
2. Technical operator assistance (Arkansas Rural Water)
3. Infrastructure Study (Magnolia River)
4. National Grant (Community Resource Group – Rural Community Assistance Partnership)

The financial management contract's focus is asset management, rate studies, budget analysis, and long range planning. Additional areas of interest also include capacity development for new systems, assisting small systems that lack capacity, board member training, and emergency response planning which will be provided by the Arkansas Rural Water Association.

The technical operator assistance contract incorporated peer to peer training whereby water systems assist one another. The focus of this assistance is to reach out to water systems with current compliance issues

and reduce the number of future potential violations.

The infrastructure study will assist in the mapping of small water systems, along with providing operators assistance in maintaining and locating critical infrastructure components within their water systems such as pipe sizing, length, and age. Magnolia River has completed the mapping of 37 ADH water systems.

The National Grant is managed by the Community Resource Group's Rural Community Assistance Partnership which will focus on compliance with the Stage 2 Disinfectants and Disinfection Byproduct Rule and operation and maintenance of private wells.

B. Operator Certification

The ADH adopted the Operator Certification program with final approval from EPA in March 2001. As part of the reauthorization of SDWA, the DWSRF program was established for States to finance infrastructure improvements for public water systems. In order for States to avoid a 20% withholding of the State's DWSRF current allotment, the State must report to EPA that it is implementing a program for certifying operators of community and non-transient, non-community drinking water systems, in accordance to the requirements of section 1419 of the SDWA.

ADH offers two types of operator certifications: Distribution and Treatment. The distribution certification consists of five classifications and the treatment certification that consists of four classifications. In all, the more complex the system and population it serves, the higher the level of certification. Operator certifications are valid for two years whereby operators must maintain their current level of certification by having 24 hours of continuing education. The number of licensed operators in Arkansas is illustrated in the Drinking Water Operator Licenses in Arkansas table below for years 2011, 2012, and 2013 (Table 3).

Table 3
Drinking Water Operator Licenses in Arkansas

# of Water Systems	Community PWS			NTNCPWS			Transient PWS		
	2011	2012	2013	2011	2012	2013	2011	2012	2013
License Required	722	717	702	35	35	35	21	19	19
Have Licensed ORC (December 31, 2013)	718	703	692	35	35	34	21	17	19
Need License	4	14	10	0	0	1	0	2	0
Per Cent Compliant	99%	98%	98.5%	100%	100%	97%	100%	89%	100%

Currently there are 2,209 active drinking water operators in the State of Arkansas along with 3,447 persons categorized as operators in training.

ADH has two contracts in place to assist with operator certification; one with the Southern Arkansas University Tech's Arkansas Environmental Training Academy (AETA) and the other with Arkansas Rural Water Association (ARWA). Both AETA and ARWA are to teach up to two classes each month.

Fiscal Year 2012 marked the end of the Operator Certification Grant which ADH utilized to train water operators. During Fiscal Year 2013, ADH relied on the use of the state's operator certification grant funding and State Revolving Funds (SRF) to maintain this program. In 2014, the program was impacted once again with the expiration of the operator certification contracts with AETA and ARWA, which took place on June 30, 2014. The loss of these contracts are significant whereby AETA and ARWA have curtailed their ability to provide the mandatory courses for the drinking water license exam preparation each month.

ADH has also seen a steady rate of increase in the demand for drinking water license applications that may be attributed to retirements and turnovers in the drinking water program.

A major change to the ADH Operator Certification program took place on January 1, 2014, regarding examinations. A person interested in sitting for an exam must now formally register and schedule their exam 45 days prior to the desired exam session. No longer can the person take an operator certification class and then immediately sit for the exam. As a result of this action, the passing rate on the Operator Certification exam has decreased.

The license program also had two other significant exam process changes that took effect July 1, 2014. The changes included moving to the Association of Boards of Certification (ABC) validated national standardized exams, whereby the previous exams had been customized exams for Arkansas using ABC valid states specific exam questions, and utilizing a computer-based format exam through Applied Measurement Professionals Exam Assessment Centers as an alternative to the quarterly ADH paper based exams.

ADH requires that all licensed operators obtain 24 hours of continuing education every two year renewal cycle. At least 12 contact hours of the required 24 hours must be training directly related to water system operations.

The EPA Region 6 point of contact for Operator Certification is Mrs. Amy Camacho and she can be reached at 214-665-7175.

C. Sanitary Survey

The Engineering Section of ADH conducts sanitary surveys for community water systems using surface water every two years and for systems using ground water, purchased ground water, or purchased surface water, surveys are conducted every three years.

In FY 2014, 371 sanitary surveys were conducted by ADH. For FY 2015, ADH anticipates to conduct around 336 surveys. The common issues observed during the sanitary surveys were lack of cross connection control program, weak water storage tank inspection/maintenance practices, and the need for additional follow up visits to ensure that system deficiencies have been corrected.

An emerging area with regards to sanitary surveys that ADH has noticed involves drinking water vending machines and water haulers. There are currently 80 active water vending machines in the ADH drinking water inventory that are operated either by corporations or by independent operators and 1 ADH regulated water hauler.

D. Arkansas Area Wide Optimization Program

ADH continues to enhance its Area Wide Optimization Program (AWOP) and Comprehensive Performance Evaluation (CPE) program whereby the ADH program is considered one of the lead States in the Region 6 AWOP program to implement AWOP principles. ADH management continues to support the AWOP program by providing travel resources to attend Region 6 quarterly and National AWOP meetings.

In 2014, ADH conducted a distribution system CPE at Marion County, Arkansas, and will further expand this distribution system exercise in the upcoming years along with targeted technical assistance. In addition, ADH will bring in AWOP components when preparing for the revised total coliform rule's site selection criteria.

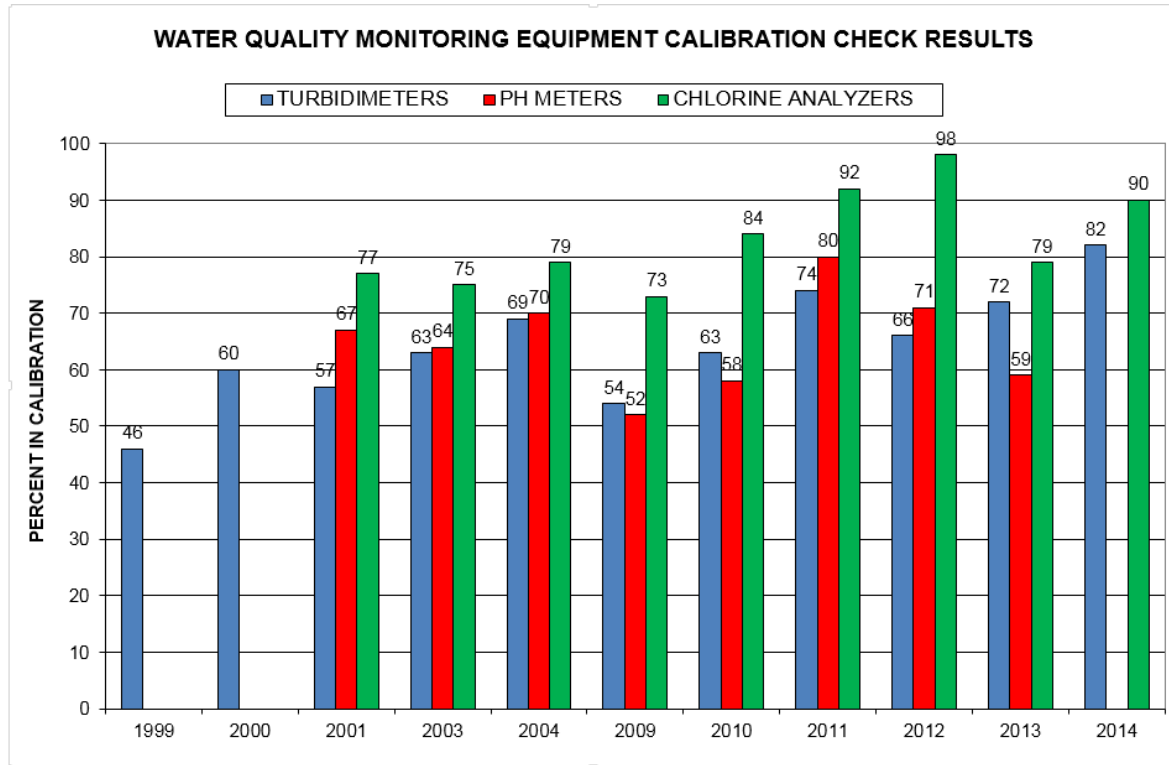
Current staff members on the ADH AWOP program are listed in the ADH AWOP member table (Table 4).

Table 4
ADH AWOP Members

Craig Corder	Vickie Welytok	Lance Jones	Jeff Stone
Don Fiegel	Marshall Hatfield	Bob Arthur	Austin Lee
Stephen Youngblood	Ken Bown	Steve Burghart	Chris Roberts
Aaron Hilborn	Chris Talley	Ashley Hobbs	Linda Taylor

The Water Quality Monitoring Equipment Calibration Check Results in Table 5 show the results of the equipment calibration check project that documents how much water quality testing equipment is in calibration verses out of calibration. FY 2014 saw an increase in the number of calibrated turbidimeters and chlorine analyzers.

Table 5
Water Quality Monitoring Equipment Calibration Check Results



F. Homeland Security

With the expiration of the Counter Terrorism Grant in 2012, ADH has no outside funding to further develop this program, but has kept up its presence in this area by communicating and participating in water security type of activities.

In 2014, ADH wrote newsletter articles regarding water security that focused on Arkansas' Water/Wastewater Agency Response Network (ARWARN), Elk River West Virginia chemical spill, water source redundancy, and EPA's community based water resiliency tool.

At the time of the Arkansas End of Year discussion, no homeland security related activities have been scheduled for FY 2015. Mr. Stone continues to serve as the Association of State Drinking Water Administrators

(ASDWA) representative on the Water Information Sharing and Analysis Center (WaterISAC) board and will serve as a liaison between the board and ASDWA security committee.

Water systems in Arkansas are instructed to notify ADH first of any emergency to their water system. If the situation is such that additional resources are needed, ADH can inform the State's Emergency Response Center for additional resources that can be initiated by the Governor's Office.

ADH informed EPA Region 6 that the 24 hour emergency phone number for the Arkansas Drinking Water Program command center is 800-554-5738. The EPA Region 6 24 hour emergency phone number is 866-372-7745 and Mr. Blake Atkins' 24 hour number is 214-406-5907.

VI. Grants and Loans

A. Public Water Supply Supervision Grant Program

The ADH drinking water program received \$957,000 in public water supply supervision (PWSS) grant funds for FY 2014 and as of February 4, 2015, all of these funds have been spent.

The tentative 2015 PWSS allocation is \$953,000. The Agency's operating agreement is still under review and final allotments will be sent once it is approved. EPA's budget includes a \$40 Million recession of old funds, but is not anticipated to affect this year's allotments. The application from the Arkansas Natural Resources Commission (ANRC) for 2014-2015 was received on August 12, 2013, and requested funding of \$1,997,047, which is much more than what will be likely allocated.

The PWSS Grant Workplan Guidance document has been put on hold until further notice. EPA staff is working with ADH to ensure that quantifiable measures are included in the workplan.

B. Drinking Water State Revolving Fund Set-Asides

ADH continues to work towards spending down the Drinking Water State Revolving Funds (DWSRF) set asides. The DWSRF Set-aside Workplan details how much of these legacy unliquidated obligations (ULOs) are expected to be drawn down, in addition to the funds received during the year. ANRC's ULOs are summarized in Table 6. The ULOs continue to be an issue due to the federal budget, and therefore ANRC is encouraged to draw down these funds for expenses in a timely manner.

EPA Region 6 staff is committed to assist ADH in reducing their ULOs and

encourages innovative projects such as source water protection, capacity development, and sustainability of the ADH PWSS program whereby all projects will positively affects the citizens of the State of Arkansas.

EPA HQ is working on a DWSRF Eligibility Handbook to help states and EPA staff work through eligibility questions. ADH staff have provided input already through previous eligibility requests to the region, and have been asked to review it in detail when HQ sends it to the states for comment later this year.

Table 6

Arkansas Natural Resources Commission (ANRC) Unliquidated Obligations (ULO)

Grant Number	Date	Total Grant Amount	Small Systems (2%)	State Prgm (10%)	Local Asst (15%)	Project End Date
FS98600113	4/5/2011	\$20,539,000.00	N/A	\$0.00	\$60,508.08	4/30/2015
FS98600115	5/14/2012	\$13,582,000.00	N/A	\$0.00	\$780,901.27	5/30/2016
FS98600116	9/12/2013	12,743,000.00	N/A	\$1,095,094.20	\$1,911,450.00	9/30/2017
FS98600117	9/22/2014	13,526,000	N/A	\$2,030,100.00	\$1,353,400.00	
			N/A	\$3,125,194.20	\$4,106,259.35	

Total ULO as of 2/2015	\$7,231,453.55
Total ULO as of 12/2013	\$7,199,817.80
Difference:	-\$31,635.75

EPA informed ADH of the quality assurance requirements that must be in place before any grants or funds are awarded. For ADH, the following quality assurance documents are on file:

QMP: Expires July 28, 2015 (Q-Track 14-389)

QAPP: Expires November 4, 2017 (Q-Track 15-064)

Quality assurance plans are due into EPA Region 6 at least 60 days prior to the expiration of the previously approved plan to allow for review and approval of the updated QA plan. However, if ADH expects substantial revisions that will be needed within the next year, it is suggested to have the plan approved for one year.

VII. Data Systems

A. Program Update

During 2014 the ADH Drinking Water Data team used version 3.2 of the Safe Drinking Water Information System (SDWIS) and version 3.4 of FedRep. Regarding the Compliance Decision Support (CDS) functions in SDWIS, ADH is determining compliance outside of SDWIS and the violations are entered manually back into SDWIS.

In the past, ADH expressed concerns regarding the next generation of SDWIS (called SDWIS Prime), due to compatibility issues between the Structured Query Language (SQL) that is currently being used by ADH and Oracle that will be used by SDWIS Prime. In addition, there were security concerns regarding the cloud server environment. In 2014, ADH participated in the SDWIS Prime workgroup and attended regular conference calls to better understand the next phase of SDWIS. Based on the understanding of how SDWIS Prime will function, ADH has indicated that they will eventually move to the SDWIS Prime operating environment.

EPA Region 6 informed ADH that technical assistance for data can be provided such as the upcoming Revised Total Coliform Rule (rTCR) update to SDWIS and for the move to SDWIS Prime.

B. EPA Cadmus Data Audit 2014 Activities

In July 2012, a data audit of the ADH Drinking Water Program was conducted by EPA Region 6 and EPA's contractor, Cadmus. One recommendation from the EPA data audit mentioned the need to have redundancy training in the ADH data team. As a first step to address this

recommendation, ADH has written an internal data standard operating procedure for the ADH data team that addresses the core reporting functions for the drinking water program. This procedure details step by step daily functions that are performed as data are released from the ADH laboratory to the ADH engineering section, along with reporting federal compliance data to EPA. The written procedure is written in a format that can be easily understood by the engineering section and the ADH's information technology department. ADH has indicated that the document will be revised annually to keep it current, based on the business needs of the program.

VIII. Program Implementation

ADH has a continuous approach for implementing new drinking water regulations without any lapses. This policy of implementing new drinking water regulations is the primary reason the ADH PWSS program is ranked nationally as having one of the highest number and percentage of water systems in compliance with newly promulgated drinking water regulations. ADH is commended on its proactive approach for implementing new drinking water rules.

A. Source Water Protection

Source water protection work in Arkansas is currently contracted out to the United States Geological Survey (USGS) and to the University of Arkansas to update the Source Water Assessment Program (SWAP) from ARC 3.2 to the most recent version. There are two phases of this work whereby phase 1 is to beta test the SWAP model and then phase 2 is to begin in January to update some of the created SWAP models. In addition, there is also a contract with Magnolia River to collect global positioning system data for potential sources of contamination for 65 water systems.

Current progress on other source water protection activities are that the karst feature mapping is about 50% completed and the Ozark Framework aquifer mapping is now 80% complete.

The EPA Region 6 point of contact regarding Source Water Protection activities is Ms. Nancy Ho who can be contacted at 214-665-3179.

B. Total Coliform Rule (TCR) and Revised TCR

The Total Coliform Rule (TCR) sets both the health goal and the legal limit for the presence of total coliforms in drinking water. The ADH workflow under this rule is such that all results are entered into the ADH total coliform database and then into SDWIS to be reported to the federal database, quarterly. During FY 2014, ADH did update some total coliform monitoring plans to ensure that sampling sites selected provided adequate coverage, along with conducting spot checks of chlorine residuals when performing sanitary surveys.

The Environmental Protection Agency has revised the 1989 TCR and the current rule remains effective until March 31, 2016. On April 1, 2016, the Revised TCR (RTCR) becomes effective and Arkansas water systems must comply with the RTCR requirements. The RTCR establishes a maximum contaminant level (MCL) for *E.coli* and uses *E.coli* and the total coliforms to initiate a “find and fix” approach to address fecal contamination that could enter into the distribution system. It requires public water systems to perform assessments to identify sanitary defects and subsequently take action to correct them. ADH has brought awareness of this new rule to the water systems via newsletter articles, annual conferences, and operator training events.

EPA Region 6 received a draft primacy application for the RTCR on October 16, 2014, and *the final primacy application was received on February 9, 2015*. After EPA Region 6’s review is completed, ADH will then obtain full primacy for the RTCR.

C. Ground Water Rule

The ground water rule establishes a risk-based approach to target ground water systems that are vulnerable to fecal contamination. ADH informed EPA that that implementation of the Ground Water Rule is proceeding smoothly through the use of ADH data tracking programs which makes compliance determinations easy to follow through.

Each triggered water system that has a total coliform positive routine distribution system sample is called to be advised of the ground water rule source water monitoring requirement. This phone call is then followed up by a letter with monitoring requirements and sample bottles for the source water sample(s). The use of this process has kept the need to conduct site visits to a minimum. Site visits are made if any of the follow up source samples are *E. coli* positive.

Between October 1, 2013 and September 30, 2014, the following activities under the Ground Water Rule occurred in Arkansas:

264	Routine distribution system triggered events
342	Total Coliform Positive triggered samples
121	<i>E. coli</i> source water samples collected
1	<i>E. coli</i> triggered positive samples
19	Systems on 4-log treatment

D. Surface Water Treatment Rule with LT2

The purpose of the Long Term 2 Enhanced Surface Water Treatment Rule (LT2 Rule) is to reduce potential disease incidence associated with *Cryptosporidium* and other disease causing microorganisms in drinking water. ADH currently has seven systems that are categorized in Bin Classification 2 for the LT2 rule, from the first round of sampling. These systems are summarized below in Table 7.

Table 7
ADH LT2 Systems and Compliance Option Initiated

System	Schedule	Compliance Option
Ft Smith – Lee Creek	2	Individual and Combined Filter Performance
Hot Spring Lakeside	2	Individual and Combined Filter Performance
Siloam Springs	3	Individual and Combined Filter Performance
Batesville	3	Individual and Combined Filter Performance. UV and/or ozone also being considered
Pocahontas	4	Individual and Combined Filter Performance
Clarksville – Piney Bay	4	Individual and Combined Filter Performance. Planning to install additional ozone contact as backup
Amity	4	Individual and Combined Filter Performance

No violations have been issued to the above systems in 2014.

For the second round of LT2 monitoring, ADH had entered into a contract with BioVir/IEH laboratory to conduct *Cryptosporidium* analyses in the State of Arkansas. Training for the second round of LT2 monitoring began in June 2014 and sampling for the large systems began in July 2014. Data

to date are as follows:

- 11 large systems are sampling source water for *E. coli* and *Cryptosporidium* at 19 sources.
- 16 large systems will begin monitoring in July 2016.
- 64 water systems (less than 10,000 population) with 75 sources will begin the second round of monitoring for *E. coli* in January 2015.

E. Consumer Confidence Reports (CCR)

The Consumer Confidence Reports requires public water suppliers that serve the same people year round to provide Consumer Confidence Reports (CCR) to their customers. These reports are also known as annual water quality reports or drinking water quality reports. In 2014, 702 water suppliers were required to submit a CCR of which 679 reported on time.

To assist with the administrative issues and the increased cost of newspaper publication of the CCR, ADH offered a web based version of the CCR to systems that have no drinking water violations. In 2014, this service was utilized by 192 water systems, representing 27% of ADH's water systems. To encourage more systems to use this reporting venue in 2015, ADH has begun outreach efforts in October 2014 to educate systems on electronic delivery and reporting options by providing presentations at district meetings, American Water Works Association meetings, and articles in the ADH newsletter. In January 2015, reminder letters will be sent to systems about this program.

The EPA Region 6 point of contact for CCRs is Mrs. Nichole Foster and she can be reached at 214-665-7248.

F. Unregulated Contaminant Monitoring Rule 3 (UCMR 3)

Arkansas is the only state in EPA Region 6 that has directly implemented the Unregulated Contaminant Monitoring Rule 3 (UCMR 3). EPA greatly appreciates ADH's efforts to assist EPA's contractors to prepare monitoring schedules, sampling logistics, and the reporting of results. At the time of this review, monitoring has been completed by 70% of the large systems and 66% of the small systems.

In preparation for UCMR 4, Ms. Susan Corder is participating in the EPA UCMR 4 advisory committee to provide ADH's perspective in planning for the next round of UCMR monitoring. This planning takes into consideration the availability of laboratory analytical instrumentation for analyzing new drinking water analytes, workload, and potential costs for water systems.

G. Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR)

The Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR) is intended to reduce potential cancer and reproductive health risks from two groups of disinfection byproducts (trihalomethanes [TTHMs] and haloacetic acids [HAA5]) in drinking water. These disinfection byproducts form when disinfectants are used to control microbial pathogens.

In 2014, ADH issued 31 MCL violations regarding the Disinfection Byproducts Rule where 23 violations were for the Stage 1 running annual average violations and eight were for Stage 2 DBPR locational running annual average violations. Operator Evaluation Level (OEL) notifications were sent out to 22 water systems and 11 OEL reports have been received to date. As a result of water systems exceeding the MCL for TTHMs and/or HAA5, 19 water systems were placed on increased monitoring.

H. Lead and Copper Rule

The lead and copper rule is designed to protect public health by minimizing lead and copper levels in drinking water, primarily by reducing water corrosivity. Lead and copper enters drinking water mainly from corrosion of lead and copper containing plumbing materials.

Overall in 2014, ADH had a strong compliance rate for the Lead and Copper Rule with only two water systems that did not sample for this requirement. ADH was also informed by the ADH Public Health Laboratory of laboratory delays in the processing of lead and copper samples. This resulted in lead and copper samples to be batched and the reporting of results to be delayed.

Arkansas water systems were aware of the implementation of the Reduction of Lead in Drinking Water Act of 2011, which became effective on January 4, 2014, in that water systems transitioned very well to this new requirement. This was especially seen in the installation of new lead free water meters.

The EPA Region 6 point of contact for the lead and copper rule is Ms. Shirley Mlachak and she can be reached at 214-665-2267.

IX. Enforcement

The goal of this evaluation is to ensure that timely and appropriate State enforcement responses are taken where violations of drinking water regulations are found.

A. Program Review

The Arkansas enforcement program review was conducted by EPA Region 6's Drinking Water Enforcement Program representatives Ms. Zakiya (Kiya) Davis and Ms. Hannah Branning, along with ADH's enforcement coordinator, Ms. Robin Michaels.

A focus area for the Region 6 enforcement program concerns small system compliance. ADH discussed the steps it undertakes to return small systems back into compliance. The process begins by issuing warning letters to the water system and these systems are usually back into compliance within 12 months. For systems that do not return to compliance, ADH then issues an administrative order. This administrative order does allow the water system to apply for technical assistance from Rural Water. Should the administrative order not be successful, a consent order is then issued. ADH anticipates issuing 20-30 consent orders in 2015. If a system is still unable to achieve compliance, ADH will bring the water system in front of the board for a formal hearing.

For 2015, ADH stated that compliance with the TCR, RTRC, and Stage 2 DBPR will require more enforcement actions as water systems continue to have difficulty adhering to these regulations.

B. EPA Region 6 Enforcement Point of Contact for Arkansas

The EPA Region 6 primary enforcement point of contact is Ms. Zakiya (Kiya) Davis who can be reached at 214-665-2184 or davis.zakiya@epa.gov. The backup is Ms. Hannah Branning who can be reached at 214-665-7489 or branning.hannah@epa.gov.

C. Conclusion

Assistance provided by the ADH throughout the year is well appreciated by EPA Region 6. EPA commends the hard work by ADH staff in responding to the citizens' complaints in a timely manner, and addressing the violations of the systems on its ETT list.

X. Arkansas Drinking Water Updates

A. Arkansas Preparation for Source Water Concerns

In response to the Elk River West Virginia chemical spill, ADH is prepared, should an event of this nature take place in Arkansas. ADH's Source Water Protection staff can assist water systems in assessing and preventing risks to a water system's source water, including those from chemical storage facilities. In addition, ADH has an advantage in that the state's public health epidemiology division, emergency preparedness group and the engineering section are all housed in one Agency and if the Agency had to act, this action can be undertaken.

Also, in the State of Arkansas, the Director of the Arkansas Department of Health can issue a "Do Not Use" order regarding drinking water.

B. Harmful Algal Blooms

Algal blooms occur in natural waters used for drinking and/or recreation when certain types of microscopic algae grow quickly in water, often in response to changes in levels of chemicals such as nitrogen and phosphorous from fertilizer, in the water. Algal blooms can deplete the oxygen and block the sunlight that other organisms need to live, and some can produce toxins that are harmful to health and the environment.

The ADH Public Health Laboratory currently does not have the instrumentation to analyze harmful algal toxins such as microcystin, anatoxin, cylindrospermopsins, or saxitoxin to name a few. Should these analyses be necessary, the state will have to procure a contract with another laboratory.

C. Crossett, Arkansas

In 2014, EPA Region 6 received a copy of the report entitled "Public Health Investigation Chemical Contaminants From Industrial Manufacturing in Air and Water Affecting Residents in Crossett, Arkansas Preliminary Report and Laboratory Analysis 2012" from the Ouachita Riverkeeper organization. EPA Region 6 reviewed the records of five public drinking water systems in Ashley County, Arkansas, that served drinking water to the citizens within the vicinity of Crossett, Arkansas. In its review, EPA has determined that the public drinking water systems reviewed are in compliance of all State and Federal drinking water regulations that are implemented by ADH.

XI. Conclusions

EPA Region 6 appreciates the assistance that ADH has provided to the EPA Region 6 Drinking Water Quality Team over the past year regarding citizen inquiries, participation in EPA Region 6 AWOP activities, assisting Arkansas water systems sample for UCMR 3, sharing technical data regarding aeration projects within the State of Arkansas, assisting with a distribution system comprehensive performance evaluation, and for providing citizen outreach efforts in Crossett, Arkansas. EPA Region 6 applauds ADH for their continued initiative in the early implementation of new drinking water regulations, addressing concerns and special requests immediately upon notification, and their continued commitment to fiscal responsibility. For 2015, EPA Region 6 will continue to have quarterly conference calls with ADH to discuss drinking water related matters, grant and funding updates, and potential partnerships between EPA and ADH.

ATTACHMENT A
The Approved Primacy Program

WSG 54 Requirement § 142.10

Number	Requirement	Meeting Standard
1	<i>Adoption of drinking water regulations which are no less stringent than the national primary drinking water regulations (NPDWRs) in effect. [40 C.F.R. 141.10(a)]</i>	Yes
2	<i>Maintenance of an inventory of public water systems. [40 C.F.R. 142.10(b)(1)]</i>	Yes
3	<i>Systematic program for conducting sanitary surveys of public water systems in the State, with priority given to sanitary surveys of public water systems not in compliance with State drinking water regulations. [40 C.F.R. 142.10(b)(2)]</i>	Yes
4	<i>Establish and maintain a State program to certify laboratories conducting analytical measurements of contaminants identified in State primary drinking water regulations. Designate a laboratory officer or officers certified by the Administrator that are responsible for the State's certification program. [40 C.F.R. 142.10(b)(3)]</i>	Yes
5	<i>Assurance of the availability of certified State laboratory facilities capable of performing analytical measurements of all contaminants specified in the State's primary drinking water regulations. [40 C.F.R. 142.10(b)(4)]</i>	Yes
6	<i>Establish and maintain activities to assure that the design and construction of new or substantially modified public water system facilities will be capable of compliance with the State primary drinking water regulations. [40 C.F.R. 142.10(b)(5)]</i>	Yes
7	<i>Has adequate authority to apply State primary drinking water regulations to all public water systems in the State covered by NPDWRs. [40 C.F.R. 142.10(b)(6)(i)]</i>	Yes
8	<i>Has the adequate authority to sue in courts of competent jurisdiction to enjoin any threatened or continuing violation of State regulations. [40 C.F.R. 142.10(b)(6)(ii)]</i>	Yes
9	<i>Right to enter and inspect public water systems, including the right to take water sample, whether or not the State has evidence that the system is in violation of an applicable legal requirement. [40 C.F.R. 142.10(b)(6)(iv)]</i>	Yes
10	<i>Authority to require suppliers of water to keep appropriate records and make appropriate reports to the State. [40 C.F.R. 142.10(b)(6)(iv)]</i>	Yes

ATTACHMENT A
The Approved Primacy Program

WSG 54 Requirement § 142.10

Number	Requirement	Meeting Standard
11	<i>Authority to require public water systems to give public notice that is no less stringent than EPA requirements in § 142.32 and 142.16(a). [40 C.F.R. 142.10(b)(6)(v)]</i>	Yes
12	<i>Authority to assess civil or criminal penalties for violation of the State's primary drinking water regulations and public notification requirements, including the authority to assess daily penalties or multiple penalties when a violation continues. [40 C.F.R. 142.10(b)(6)(vi)]</i>	Yes
13	<i>Has established and will maintain recordkeeping of its activities under paragraph § 142.10(a), (b) and (d) in compliance with § 142.10 and 142.15. [40 C.F.R. 142.10(c)]</i>	Yes
14	<i>If it permits variances or exemptions, or both, from the requirements of the State primary drinking water regulations, it shall do so under conditions and in a manner no less stringent than the requirements under sections 1415 and 1416 of the Act. [40 C.F.R. 142.10(d)]</i>	No variances or exemptions in Arkansas
15	<i>Has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances. [40 C.F.R. 142.10(e)]</i>	Yes

The state of Arkansas continues to meet all of the 15 elements for primacy to implement the Safe Drinking Water Act.

ATTACHMENT B
Quarterly Meeting Notes with ADH and EPA R6

AGENDA

Quarterly Arkansas Conference Call with EPA
Thursday, March 6, 2014
10 AM CST

1-866-299-3188 and the conference code is 214-665-8088

Attendance: Jatin Mistry, Julie Hankinson, Ashley Howard, Javier Ballí,
Blake Atkins, Jeff Stone, Lance Jones, Lyle Godfrey, Teresa Lee, Amelia
Tremble, Robin Michaels, David Bradley, Gregg Treadway

1. Staffing Updates

- ADH staffing updates
 - i. ADH currently has one open secretary position and is in the process of filling this position.
 - ii. ADH will also have a few summer internship positions focused on water system data integrity and calibrations for Summer 2014.
- EPA staffing updates
 - i. 2015 proposed budget is for \$7.89 Billion.
 - ii. EPA is offering buyouts to cull 1,375 workers from its staff of 16,200. Region 6's deadline was yesterday.
 - iii. After the buyouts, there is a potential for reorganization.

2. PWSS/SRF

- Update to ADH regarding FY 2014 – FY 2015 funding documents
 - i. EPA has received its operating plan and is now waiting for approval before awarding the funds to ADH.
 - ii. ADH's final allotment will be \$957,000 and this amount is not expected to change.
 - iii. ADH can submit their draft workplans for FY 2015.
 - iv. Ashley informed ADH that there was a minor set aside data error. This error will be corrected and will be reflected in the next month's budget report.
 - v. Workplan changes to be requested:
 - 1. Currently the ADH workplan has laboratory staff for UCMR 3 and UCMR reagents listed in separate parts of the workplan. To make this clear, it was recommended that these UCMR items (laboratory staff, equipment, and reagents) be placed under one set aside, the State Program Management set aside.

3. Enforcement

- Ms. Michaels provide the last quarter ETT update to EPA and is awaiting a response from enforcement.
- ADH has made great progress on removing systems from the ETT list. The systems that were removed from the ETT list were systems that returned to compliance who were associated with the Ozark Mountain Regional Public Water Alliance Project and systems that now have a licensed operator.

4. Data

- Federal Public Notice reporting update
 - i. ADH informed EPA that 104 Public Notices violations have been uploaded to the EPA FED database.
 - ii. The majority of these Public Notices originated from Total Coliform Rule or Monitoring and Reporting violations.
- Progress on redundancy training for SDWIS
 - i. Mr. Treadway stated that not one person can do the work of Mr. Bradley and that cross training of the data position is needed.
 - ii. A questionnaire on Mr. Bradley's work duties has been completed and based on the responses; Mr. Treadway will divide up the workload among 3-4 ADH Engineering staff employees.
 - iii. Mr. Treadway stated that the cross training will begin soon.
 - iv. ADH requested assistance from EPA Region 6 on obtaining a SDWIS data dictionary that can be provided to new staff members to better understand SDWIS. EPA Region 6 will provide materials for this to ADH.

5. Drinking Water

- Preparation for electronic CCRs
 - i. Ms. Lee stated that 25-30% of the 2013 CCRs have been completed. Out of these, about 30% of ADH's water systems are interested in the electronic CCRs.
 - ii. The electronic CCRs will be housed on the ADH website and will also have historical reports including the years 2011 and 2012.
 - iii. ADH has two training sessions planned to inform ADH water systems of the electronic CCR option.
- Reduction of Lead in Drinking Water update and ADH concerns
 - i. ADH stated that once the fire hydrant issue was resolved, systems were able to have a better understanding of the rule.
 - ii. Water system component vendors across Arkansas were able to assist systems regarding brass and bronze inventory that would meet the new rule requirements.

- iii. ADH is relying on the sanitary survey process to check if water systems are using NSF Standard 61 components in their systems.
 - LT2 sampling and contract update
 - i. The LT2 sampling contract is now with the state purchasing team and the bidding process has opened.
 - ii. ADH systems are scheduled to begin round 2 of monitoring in July 2014.
 - Number of Sanitary Surveys completed
 - i. ADH stated that 250 field visits have been completed since July 1.
 - ii. 2/3 of the reports have been completed to date.
 - iii. Significant deficiencies are tracked outside of SDWIS and when a violation is issued, these data are placed into SDWIS.
 - Discussion on ADH water systems to use digital chlorine analyzers versus color wheels
 - i. ADH systems are encouraged to use digital chlorine analyzers but there is no state requirement.
 - ii. Federal regulations allow for the use of color wheels and ADH allows the use of this device.
 - Cancer Registry
 - i. The ADH point of contact for the Cancer Registry is Ms. Shirley Louie.
 - Crossett, AR
 - i. EPA Region 6 is actively engaging with the citizens of Crossett, Arkansas, regarding their concerns of their drinking water.
 - ii. ADH is committed to assisting EPA with any special water sample analyses that may need to be performed in Crossett. The ADH public health laboratory will be utilized for this effort.
6. Update on ADH Rules and Regulations Pertaining to Public Water Systems
- i. The updated ADH drinking water rules became effective on February 24, 2014.
 - ii. The rules have been finalized and an update will be provided in the April 2014 ADH newsletter.
 - iii. The next review will occur when drinking water rules at the state or federal level change or when new rules are introduced.
7. Assistance from EPA Region 6
- i. EPA Region 6 can provide training assistance to ADH regarding sanitary survey and/or SDWIS training.

8. The Next Quarterly Arkansas Conference Call with EPA is scheduled for Thursday, June 5, 2014 from 10 AM to 11 AM.

ATTACHMENT B
Quarterly Meeting Notes with ADH and EPA R6

Quarterly Arkansas Conference Call with EPA
Thursday, June 5, 2014
10 AM CST

1-866-299-3188 and the conference code is 214-665-8088

Attendance: Ashley Howard, Hannah Branning, Andy Waite, Jatin Mistry, José Rodriguez, Blake Atkins, Amy Camacho, Jeff Stone, Lyle Godfrey, Lance Jones, Amelia Tremble, Robin Michaels, David Bradley, Gregg Treadway, Teresa Lee

1. Staffing Updates

- ADH staffing updates
 - i. The ADH secretary position and the administrative position have been filled.
 - ii. The CCR rule manager has been replaced by Lauran Nelson.
 - iii. District 6 and District 1 have one open position each that will be refilled.
- EPA staffing updates
 - i. A co-Arkansas Drinking Water State Program Manager has been designated to provide additional support for Arkansas. Mr. José Rodriguez will share the program duties with Jatin. Mr. Rodriguez can be contacted at Rodriguez.jose@epa.gov or 214-665-8087.
 - ii. EPA Region 6's Source Water Protection Branch has an acting Associate Director, Mr. James (Jim) R. Brown. Mr. Brown is acting for Stacey Dwyer who is on a detail until September. Mr. Brown can be contacted at: Brown.jamesr@epa.gov or 214-665-3175.
 - iii. EPA Region 6 reorganization talks are progressing and plans to be implemented by October 1, 2014.

2. PWSS/SRF

- Funding update and ULO
 - i. ADH's final 2014 allotment was \$957,000 and this amount has been awarded. Balance is \$369,602.
 - ii. No news about the new award. No PWSS final workplan is to be submitted.
 - iii. The DWSRF Final PER is being finalized today or tomorrow, and there were no comments from the state. EPA placed a statement about the increase of set-aside expenditures in the cover letter as follows: "EPA appreciates the state's increased focus on the DWSRF unliquidated obligations

(ULOs) during the past year and for increasing the set-aside spending rate from 61 percent to 71 percent.”

- iv. EPA Received the AR IUP this week. The public hearing is in mid-June, and comments will be received shortly thereafter.
- v. EPA can award based on the draft plan and will start that award shortly after the review and commenting period. Target award date mid-July.
- vi. Please note the set-aside workplans are due 90 days after the award.
- Future laboratory equipment needs for drinking water
 - I. ADH's Total Organic Carbon (TOC) analyzer was approved which started a conversation about equipment purchases and EPA Region 6 will offer any flexibility that we can.
 - II. ADH has a deprecation list of laboratory equipment extending to year 2027. In 2015, ADH hopes to replace the High Performance Liquid Chromatography equipment and the Gas Chromatography Mass Spectrophotometer.
- QMP expires 9-27-14; QAPP expires 11-5-14.
- New electronic system coming next year for applying. EPA does not have a lot of information right now but will send information as it comes along.

3. Capacity Development and Source Water Assessment Plans

- SWAP update
 - i. Ms. Amy Camacho from EPA Region 6 will travel to Arkansas to meet with the ADH Source Water Assessment Program at the end of July or early August.
 - ii. Ms. Camacho will also start up quarterly calls related to Source Water Assessment activities in Region 6.
- Capacity Development and small system assistance
 - i. EPA Region 6 sent out comments to ARWA
 - ii. ADH suggested an emphasis on board member training
 - iii. EPA topics consisted of the following:
 - 1. Preparation for the Revised Total Coliform Rule. Introduce systems on how to fill out a Level 1 assessment.
 - 2. Assist water systems that have been triggered under Stage 2 to conduct more frequent sampling (annual sampling to every 90 days).
 - 3. Help systems prepare for sanitary surveys.
 - 4. Help water systems with water storage tank management to prevent tank stratification.
 - 5. Help rural water systems maintain a minimum chlorine disinfectant in the extreme parts of their distribution system with process control monitoring skills.

6. Remind water systems of source water protection and to keep an eye of potential sources of contamination that can impact water sources.

4. Enforcement

- EPA Region 6 Enforcement has received the current quarter's ETT list with ADH comments.
- ADH stated that there are 30 systems on the ETT list with 8 systems on the road to compliance.
- Watson Water Works has the most ETT points for the Arkansas data that were generated due to no certified operator under the Stage 2 DBPR rule.

5. Data

- Progress on redundancy training for SDWIS
 - i. ADH is establishing a process to obtain redundancy support for state SDWIS activities.
 - ii. The data process is long and ongoing. Current training activities consisted of submitting documents to EPA for the quarterly federal upload for Arkansas.
 - iii. Several staff members have been selected to provide back up support for state SDWIS activities.
- Arkansas Drinking Water Watch
 - i. The process to set up Drinking Water Watch is dependent upon the approval actions of ADH's IT department.
 - ii. A quarterly download for ADH's data will be sent to Mr. Andy Waite.
- SDWIS Prime
 - i. ADH will need to upgrade from SDWIS version 3.1 to 3.2
 - ii. ADH is looking at late June to perform this upgrade.
 - iii. ADH expressed concerns regarding SDWIS prime and access to its live data on the cloud server.

6. Drinking Water

- CCR Update
 - i. ADH has about 40% of the state's CCR certified with about 30% of the reports distributed electronically.
 - ii. The CCR trend in Arkansas favors paper CCRs rather than electronic CCRs.
 - iii. ADH will conduct additional CCR training actives and outreach efforts in late Fall 2014 to prepare for CCRs due in 2015.
- LT2 sampling and contract update
 - I. Contract is in place to use BioVir Labs for the next 6 years.
 - II. LT2 training sessions for the first round of systems will begin in July.

- Sanitary Surveys
 - I. ADH has conducted 329 field surveys.
 - II. ADH has finalized 315 survey reports.
 - RTCR
 - I. ADH is moving forward toward requesting primacy for the RTCR.
 - II. ADH will attend the EPA Region 6 primacy guidance meeting in July.
 - III. ADH believes that it will have the primacy package to EPA in time and has the appropriate training and staff in place.
 - Crossett Update
 - I. EPA Region 6 has receive a FOIA on the Crossett report.
 - II. Mr. Stone received a letter from the Mayor's office regarding the Crossett community meeting thanking ADH for their support for the Crossett Water Commission.
7. Assistance from EPA Region 6
- Sanitary Survey Training is available.
 - Data Training (Mark/Andy) is available.
8. The Next Quarterly Arkansas Conference Call with EPA is scheduled for Thursday, September 11, 2014 from 10 AM to 11 AM.

ATTACHMENT B
Quarterly Meeting Notes with ADH and EPA R6

AGENDA

Quarterly Arkansas Conference Call with EPA

Wednesday, September 17, 2014

10 AM CST

1-866-299-3188 and the conference code is 214-665-8088

Meeting Attendees: Blake Atkins, Andy Waite, Jatin Mistry, Nichole Foster,
Ashley Howard, Hannah Branning, Jeff Stone, Lyle Godfrey, Lance Jones, Robin
Michaels, Amelia Trimble, Gregg Treadway, David Bradley

1. Staffing Updates

- ADH staffing updates
 - i. District 6 position has been filled.
 - ii. Current vacant position is the District 1 specialist.
- EPA staffing updates
 - i. Jim Brown continues to be the acting Associate Director for the Source Water Protection Branch.
 - ii. Entry level positions at EPA were announced this summer and hiring process is underway.
 - iii. Internal drinking water positions have recently been announced.

2. PWSS/SRF

- Funding update and ULO
 - i. ADH has an approved IUP.
 - ii. ADH has indicated that their ULO balance is not correct.
 - iii. Grants are currently being processed by EPA.
 - iv. The grants section is looking to establish a consistent manner on how grants are allocated in Region 6.
 - v. ADH has taken under advisement a funding option regarding contractor support for the 2015 Drinking Water Needs Survey.
- Future laboratory equipment needs for drinking water
 - i. EPA grants has an eligibility handbook that has been developed regarding when funding can be applied towards a state's laboratory need.
- QMP
 - i. FFY15 (QTRAK #14-389) and new expiration date is September 27, 2015.
 - ii. QAPP expiration date is November 5, 2014 and ADH is working on this document.

3. Capacity Development and Source Water Assessment Plans

- Update on small system assistance from Arkansas Rural Water
 - i. There was a thorough discussion regarding training opportunities for small and rural water systems.
 - ii. ADH and RWA shared the same training approach for Arkansas systems.
 - iii. The Source Water Assessment model recently revised by USGS is being beta tested to determine how well the model is working.

4. Enforcement

- Update regarding the current quarter's ETT list
 - i. The last quarter's ETT list had 30 systems.
 - ii. The current July 2014 ETT list has 23 systems and follows along a nationwide drop in ETT scores.
 - iii. Common issues observed from the ETT list in Arkansas
 1. Systems not collecting samples.
 2. Consecutive systems receiving poor water quality.
 3. Stage 2 Disinfectants and Disinfection Byproduct Rule.

5. Data

- Progress on standard operating procedure documentation for SDWIS activities at ADH
 - i. Mr. Bradley has created several draft SDWIS standard operating procedures regarding the data functions and needs of the ADH drinking water program.
 - ii. These standard operating procedures are being reviewed, organized, and tested by ADH staff.
 - iii. Not all scenarios and error codes will be documented. Emphasis will be placed on common errors encountered by ADH.
 - iv. A rough draft of the data standard operating procedure should be ready by December 2014.
- SDWIS Prime
 - i. ADH was unable to attend the last conference call.
 - ii. ADH has migrated to SDWIS 3.2.
 1. EPA informed ADH to keep an eye on Ground Water Rule triggered violations as a result of this upgrade.

6. Drinking Water

- CCR Update
 - Several ADH water systems have not submitted their public verification documents. ADH staff is following up with these systems.
- LT2 sampling update
 - ADH has collected two months of Cryptosporidium data.

- Out of state laboratory support is progressing well.
- Number of Sanitary Surveys completed so far
 - i. As of ADH FY 2014, 374 sanitary surveys have been completed.
 - ii. For CY 2014, ADH anticipates completing 200 sanitary surveys.
- ADH August Crossett outreach update
 - i. ADH staff from the communications and epidemiology departments attended this outreach effort.
 - ii. ADH had a positive experience from this outreach effort.

7. ADH Discussion Items

- ADH Drinking Water Program funding
 - i. ADH Engineering has informed ADH management that the outlook on federal funding is uncertain.
 - ii. ADH has not had a fee increase in 1997. The current fee rate is 0.30 per meter which brings in \$4.1 Million. With inflation and other factors, the actual purchasing power of the 0.30 fee is reduced to 0.25.
 - iii. ADH may request a fee increase in 2017.
- Funding for safety equipment for systems that fluoridate
 - I. The Delta Dental grant does allow for the purchase of reasonable safety equipment for systems that fluoridate.

8. Assistance from EPA Region 6

- Sanitary Survey and Data Training
 - i. ADH was informed to contact EPA Region 6 should there be a need for any drinking water training needs.

9. EPA special request regarding TCR violations (Bmon)

- Financial incentive to avoid monitoring and reporting violations
 - i. EPA Region 6 informed ADH of an approach that can be used for small water systems (<500) to encourage these systems from missing required monitoring.
 - ii. An example from the State of Ohio was provided as to how Ohio addresses these monitoring violations with administrative fines and penalties.
 - iii. Systems are charged \$150 (small) to \$1000 (large).
 - iv. Arkansas will evaluate if their administrative law allows for the administration of penalties.
 - v. ADH will discuss this approach with the Engineering section's legal counsel.

10. Revised Total Coliform Rule

- Progress report on adoption of rule
 - i. ADH is working on the crosswalk.
 - ii. ADH may have a draft to EPA by October 2014.

11. The Next Quarterly Arkansas Conference Call with EPA will be the Annual End of Year Review for 2014 in December (Thursday, December 11, 2014)

ATTACHMENT C
Primacy Revision & Program Update for ADH
(Revised 02/09/2015)

	Draft Primacy Revision Application		State Adoption		Final Primacy Revision Application		Final EPA Approval	
Rule	Status	Date	Status	Date	Status	Date	Status	Date
IESWTR	Actual	12/00	Adopted	07/99	Actual	10/01	Approved	04/10/02
Stage 1 DBPR	Actual	12/00	Adopted	07/99	Actual	10/01	Approved	04/10/02
CCR Rule	Actual	01/00	Adopted	07/99	Actual	12/00	Approved	11/01
Variance and Exemption Rule	Actual	02/02	Adopted	07/99	Actual	09/02	Approved	09/03
New PWS Definition	Actual	01/00	Adopted	07/99	Actual	12/00	Approved	11/01
Administrative Penalty Authority	NA	NA	Adopted	02/91	Actual	12/00	Approved	11/01
Lead and Copper Rule Minor Revisions	Actual	12/01	Adopted	01/02	Actual	12/01	Approved	09/03
Public Notification Rule	Actual	02/02	Adopted	01/02	Actual	09/02	Approved	09/03
Arsenic	Actual	09/02	Adopted	01/02	Actual	12/02	Approved	09/03
Radiological Rule	Actual	09/02	Adopted	01/02	Actual	09/02	Approved	09/03
Filter Backwash Rule	Actual	06/03	Adopted	01/02	Actual	06/03	Approved	09/03
LT1 Rule	Actual	01/04	Adopted	01/04	Actual	01/04	Approved	06/04
Stage 2 DBPR	Actual	12/07	Adopted	01/07	Actual	12/07	Approved	05/08
LT2 Rule	Actual	12/07	Adopted	01/07	Actual	12/07	Approved	05/08
GWR	Actual	11/08	Adopted	11/07	Actual	11/08	Approved	05/13/09
Pb & Cu Minor Revisions	Actual	5/09	Adopted	11/07	Actual	08/10/09	Approved	12/18/09
Revised Total Coliform Rule	Actual	10/14	Pending		Actual	02/09/15	Pending	

ATTACHMENT C (Continued)
Primacy Revision & Program Update for ADH
(Revised 12/31/2014)

Program Area	Deadline for EPA Final Approval	Draft program Submitted		Final Program Approval	
		Projected	Actual	Projected	Actual
Capacity Development- Existing Systems	08/06/2000	07/2000	07/2000	09/2000	08/11/2000
Operator Certification	02/05/2001	08/2000	01/31/2001	02/2001	03/2001

ATTACHMENT D
Performance Annual Measures (PAM)

PAMs

PERIOD: 07/01/2013 THRU 06/30/2014

Data pulled from Headquarters October 2014 NMP Pivot tables

Code	Measure	Goals			EPA Region 6	Arkansas (ADH)
		FY	GOAL			
211	Water Safe to Drink: Percentage of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through effective treatment and source water				90.0%	92.5%
		11	87.0%			
		12	85.0%			
		13	85.0%			
		14	85.0%			
		15	.0%			
SP-1	Percentage of the community water systems that provide drinking water that meets all applicable health-based drinking water standards through effective treatment and source water				85.9%	85.6%
		11	85.0%			
		12	85.0%			
		13	85.0%			
		14	85.0%			
		15	.0%			
SP-2	Percentage of "person months" during which community water systems provide drinking water that meets all applicable health-based drinking water standards				95.3%	97.2%
		11	94.0%			
		12	94.0%			
		13	94.0%			
		14	94.0%			
		15	.0%			

ATTACHMENT D (Continued)
Performance Annual Measures

Comparison of results over the last 6 “rolling 4-quarter” periods for CWS % population (Measure 2.1.1) and % systems (Measure SP-1) in compliance with all health based standards				
Period Covering	R6		AR	
	% POP	% SYS	% POP	% SYS
7/1/2013 – 6/30/2014	90.0%	85.8%	92.5%	85.6%
4/1/2013 – 3/31/2014	89.8%	86.7%	92.7%	86.4%
1/1/2013 – 12/31/2013	80.0%	86.8%	90.8%	86.9%
10/1/2012 – 9/30/2013	91.5%	87.2%	93.1%	88.2%

ATTACHMENT D (Continued)
Performance Annual Measures

Comparison of Sub objective SP-2 results over the last 6 “rolling 4-quarter” periods for Percentage of "Person Months" during which CWS are in compliance with all health based standards		
Period Covering	Region 6	Arkansas
7/1/2013 - 6/30/2014	95.3%	97.2%
4/1/2013 – 3/31/2014	95.5%	97.1%
1/1/2013 – 12/31/2013	93.0%	97.1%
10/1/2012 – 9/30/2013	96.1%	97.6%

Attachment E

Number of Systems in Violation in Arkansas During FY 2014
(October 1, 2013 thru September 30, 2014)
(Data frozen January 2015)
(Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)

MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Phase II/V	IOC				2						2
Radiological (Rads)									1		1
Disinfection By-Products Rule	Stage 1	27	5		1						33
	Stage 2	2		1							3
Surface Water Treatment Rules	LT 2							1			1
	SWTR	4			1						5
Lead and Copper Rule		3									3
Ground Water Rule								1			1
Total Coliform Rule		58	8	9	3			13			91
M and R and Consumer Notification Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	10	2	1							13
Surface Water Treatment Rules	LT 1							6			6
	SWTR	1	1					6			8
Lead and Copper Rule		21		1	1						23
Ground Water Rule		12	1					13			26
Total Coliform Rule		64	5		6			120	1		196
Consumer Notification	CCR	76	3		1			1	1		82
	PN	28	1		1			51	1		82

Number of Violation in Arkansas During FY 2014
(July 1, 2013 thru June 30, 2014)
(Data frozen October 2014)
(Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)

MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Phase II/V	IOC				2						2
Radiological (Rads)									1		1
Disinfection By-Products Rule	Stage 1	146	8		3						157
	Stage 2	2		1							3
Surface Water Treatment Rules	LT2							1			1
	SWTR	6			1						7
Lead and Copper Rule		5									5
Ground Water Rule								1			1
Total Coliform Rule		75	9	11	3			18			116
M and R and Consumer Notification Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	11	2	1							14
Surface Water Treatment Rules	LT 1							11			11
	SWTR	1	1					20			22
Lead and Copper Rule		31		1	1						33
Ground Water Rule		13	1					17			31
Total Coliform Rule		85	6		8			192	1		292
Consumer Notification	CCR	131	3		1			2	1		138
	PN	72	1		1			90	2		166

ATTACHMENT F
ADH PWSS FY 2014 Program Review
Follow-up Action Items

ACTION ITEM	RESPONSIBILITY	COMPLETE
Address ADH laboratory capacity and continued support	ADH	Follow up with ADH by quarterly conference call
Provide assistance to ADH regarding SDWIS upgrades	EPA Region 6 (Mark McCasland and Andy Waite)	Follow up with ADH by quarterly conference call
Check status of ADH's data redundancy training and annual SOP update	ADH	Follow up with ADH by quarterly conference call
Discussion of SDWIS Prime and Utilization of SDWIS Prime for ADH	ADH	Follow up with ADH by quarterly conference call
Provide information to ADH regarding future webinars or presentations provided by EPA HQ.	EPA	Follow up with ADH by quarterly conference call or by E-mail
Provide deadlines for all regulatory requirements respective to Region 6 DWS and associated grant funding.	EPA Region 6 State Program Mgr/Grants	Follow up with ADH by quarterly conference call
Continue to have quarterly phone calls with ADH Drinking Water Management	ADH	Jatin will coordinate the quarterly ADH conference call
Remind ADH that the current QMP expires on July 28, 2015	ADH	Follow up with ADH by quarterly conference call
Topics of interest to be covered and/or presentations to be made at 5-State meeting in January 2015	ADH	ADH will present the state update

ATTACHMENT G
EPA Region 6 Sign In Sheet



Arkansas Department of Health



Arkansas Department of Health
 FY 2014 End of Year
 Thursday, December 18, 2014
 Sign-In Sheet

<u>Name</u>	<u>Title</u>	<u>Agency</u>
1. Jatin H. Mistry	Life Scientist	EPA R6
2. Andy J. White	Env. Eng	EPA R6
3. SHIRLEY MLACHAK	EPS	EPA R6
4. NANCY HO	Environmental Scientist	EPA R6
5. Nichole M Foster	Environmental Engineer	EPA R6
6. Michael Berbold	Almost Retired	EPA R6
7. Hannah Branning	Environmental Scientist	EPA R6
8. Zakiya Davis	EPS	EPA R6
9.		
10.		
11.		
12.		


ATTACHMENT H
ADH Sign In Sheet and Organizational Chart



Arkansas Department of Health



Arkansas Department of Health
 FY 2014 End of Year
 Thursday, December 18, 2014
 Sign-In Sheet

<u>Name</u>	<u>Title</u>	<u>Agency</u>
1. Jeff Stone	Director	ADH
2. TERESA LEE	ENGINEER SUPERVISOR	ADH
3. Lance Jones	chief Engineer	ADH
4. Amelia Trimble	Budget Analyst	ADH
5. Lyle Godfrey	Chief, Tech Support	ADH
6. Martin Nutt	Training & Certification Officer	ADH
7. CRAIG CORNER	ENGINEER SUPERVISOR	ADH
8. David Bradley	Data Analyst	ADH
9. Gregory Treadway		ADH
10. Ken Bown	SWP sup.	ADH
11. Robt Michaels	enforcement	ADH
12.		
13		

Engineering Section / Dept. of Health Organization Chart

Name	TITLE	Function
Stone, Jeff, P.E.	Director	Section Director
IT		
-Treadway, Gregory	Computer Support Coordinator	GIS / LAN / Data Management Supervisor
Hill, Stephen S.	Geologist	GIS Support
Bradley, David E.	Software Support Analyst	Database Management & Programming
Thompson, Andrew B.	Software Support Analyst	Application Programming
Lyons, Jennifer	Computer Support Specialist	SDWIS Support
Beard, Matthew	Engineer Technician	PC Support / Plan Rev Backup
Mance, Margaret	Engineer Technician	Plan Logging / Scanning
Water Operator Licensing Program		
-Nutt, A. Martin	ADH Environmental Supervisor	Training and Certification Officer
Prioleau, Alicia	Environmental Health Specialist	Operator Training
Hampton, Ida	Administrative Specialist III	Operator Certification
Enforcement		
-Michaels, Robin	Environmental Health Specialist	Compliance & Enforcement
Administrative Support		
-Amelia Trimble	Budget Analyst (Program Support Manager)	Fiscal Management / Administrative Supervisor
-Gaston, Cathy M.	Administrative Analyst (Admin Supervisor)	Administrative Support – Fee Collections
Johnson, Anastasia	Administrative Specialist II	Administrative Support – Routing, Mail
Marks, Linda K.	Administrative Specialist II	Administrative Support - General
-Lawson, Sharon D.	Human Resources Program Rep (Admin Supervisor)	Human Resources / Payroll / Clerical Supervisor
Mixon, Nancy	Administrative Specialist II	Administrative Support - Reception
Robertson Amber	Administrative Specialist II	Administrative Support - Microbiology Reports
Petroff, Rosalyn	Administrative Specialist III	Administrative Support - General / Scanning
-Eagle, Janet	Administrative Specialist II	Administrative Support - Timekeeper
-Charbonneau, Helen	Administrative Specialist III	Administrative Support - Purchasing / Travel
Technical Support Section		
-Godfrey, Lyle	ADH Chief Engineer	Chief - Technical Support Section
-Lee, Teresa	Engineer Supervisor	Supervisor, Water Quality & TNC Program
Brown, Taylor	Engineer P.E.	Lead/Copper & Non-Community Plan Review
Dawson, Doug	Environmental Health Specialist	CCR review
Morgan, Martha	Environmental Health Specialist	Transient Non-Community Systems
Ward, Gerald Steven	Environmental Health Specialist	Lead & Copper Rule
Nelsen, Laura	Environmental Health Specialist	CCR / Database management
Alexander, Gregory	Environmental Health Specialist	Capacity Development
-Routh, Darcia	Geology Supervisor	Supervisor - Source Water Protection Programs
Kort, Evelyn	Geologist	Wellhead Protection
Brad Jones	Environmental Health Specialist	SWAP/Permit Review
Burchfield, Stephanie	Environmental Health Specialist	WHPP/SWAP/SWP
-Bown, Ken	Engineer Supervisor	Supervisor, M/DBP Rules
Bingaman, Jan	ADH Environmental Supervisor	M/DBP - Supervisor
Phillips, Kyle J.	Environmental Health Specialist	SWTRs / GWUDI Determinations
Fiegel, Don	Environmental Health Specialist	LT2ESWTR / AWOP
Wilson, Jack	Environmental Health Specialist	Disinfection By-Product Rules
Welytok, Victoria D. (Vicki)	Engineer	SWTR - CPE, ESWTR
Roberts, Christopher	Engineer, P.E.	LT2ESWTR / AWOP
Aaron Hilborn	Engineer	Disinfection By-Product Rules
-Corder, Susan R.	ADH Environmental Supervisor	Monitoring Supervisor
Ellen, Philip K.	Engineer Technician	Sample Collection
West, Martha	Engineer Technician	Sample Collection
Fitzhugh, Steven	Engineer Technician	Sample Collection
Sanders, Andrea	Engineer Technician	Sample Collection
Harris, Joe	Engineer Technician	Sample Collection

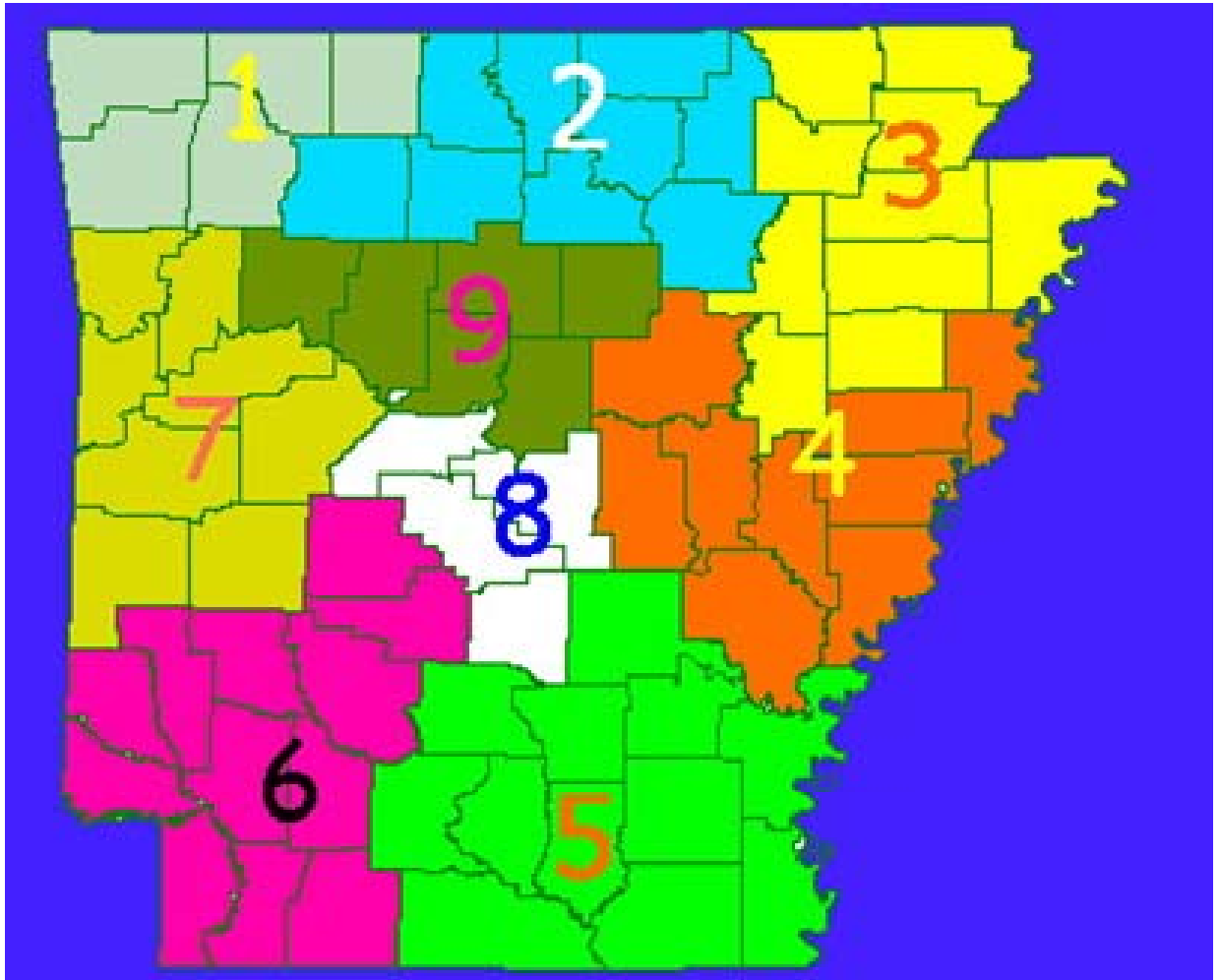
Field Surveillance Section

-Jones, Lance
-Corder, Craig S.
Holt, Charles
--Vacant--(Trent Gephart, Jan. 5th)
Lee, Austin
Johnson, Thomas
-Thompson, Raymond
Taylor, Linda
Starling, Stanley
Hobbs, Ashley
Saunders, Gerald W.
-Greenway, Glenn
Harris, Robert
Jones, Mark
Little, Clyde
Jim Barlow
-Taylor, Dennis
Faulkner, Herschel (Mac)
Gregg, Jack
Youngblood, Stephen
vacant
-Arthur, Bob
Hatfield, Marshall
Talley, Chris
Burghart, Steven
Meacham, W. Conway

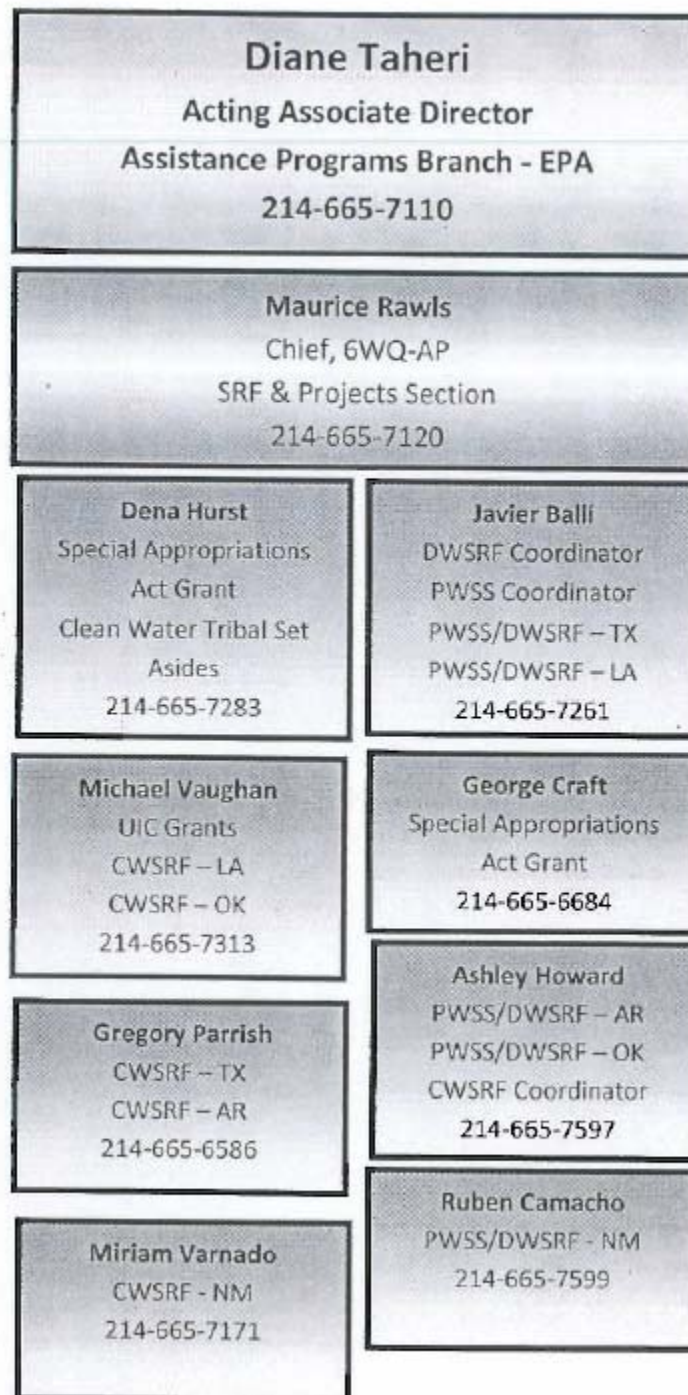
ADH Chief Engineer
Engineer Supervisor
Engineer
Environmental Health Specialist
Engineer
Engineer, P.E.
Engineer Supervisor
Engineer, P.E.
Environmental Health Specialist
Engineer
Environmental Health Specialist
Engineer Supervisor
Engineer, P.E.
Environmental Health Specialist
Engineer, P.E.
Environmental Health Specialist
Engineer Supervisor
Engineer, P.E.
Environmental Health Specialist
Engineer, P.E.
Environmental Health Specialist
Engineer Supervisor
Engineer, P.E.
Environmental Health Specialist
Engineer, P.E.
Environmental Health Specialist

Chief - Field Surveillance Section
Supervisor, District 1 / CCC / AWOP Program
District 1 (Northwest)
District 1 (Northwest)
AWOP / CPE
Cross Connection Control
Supervisor, Districts 2 & 9
District 2 (North)
District 2 (North)
District 9 (North Central)
District 9 (North Central)
Supervisor, Districts 3 & 4
District 3 (Northeast)
District 3 (Northeast)
District 4 (East)
District 4 (East)
Supervisor, Districts 5 & 6
District 5 (Southeast)
District 5 (Southeast)
District 6 (Southwest)
District 6 (Southwest)
Supervisor, Districts 7 & 8
District 7 (West)
District 7 (West)
District 8 (Central)
District 8 (Central)

ATTACHMENT H
ADH Sign In Sheet and Organizational Chart



ATTACHMENT I
EPA Region 6 Funding Organizational Chart



ATTACHMENT J
EPA Region 6 Funding Organizational Chart



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

Water Enforcement Branch

Associate Director - Jerry Saunders	214-665-6470	saunders.jerry@epa.gov
Section Chief - Willie Lane	214-665-8460	lane.willie@epa.gov

Enforcement Coordinators

Arkansas - Zakiya (Kiya) Davis	214-665-2184	davis.zakiya@epa.gov
Louisiana - Hannah Branning	214-665-7489	branning.hannah@epa.gov
New Mexico - Jenna Manheimer	214-665-7318	manheimer.jennifer@epa.gov
Oklahoma - Tonia Biggs	214-665-8551	biggs.tonia@epa.gov
Texas - Mehdi Taheri	214-665-2298	taheri.mehdi@epa.gov
Tribal - Chelo Hall	214-665-2716	hall.chelo@epa.gov

ATTACHMENT K

EPA Region 6 Drinking Water Organizational Chart



EPA 6WQ Drinking Water Section Contacts



Source Water Protection Branch
(V) 214.665.7150 (F) 214.665.2191

Associate Director – Jim Brown
Section Chief – Blake Atkins

214.665.3175 brown.jamesr@epa.gov
214.665.2297 atkins.blake@epa.gov

<u>Programs/Rules</u>		<u>State Contacts</u>	
Aircraft DWR – Jatin Mistry	214.665.7483	Texas – Amy Camacho	214.665.7175
mistry.jatin@epa.gov		camacho.amy@epa.gov	
AWOP – José Rodriguez	214.665.8087	Oklahoma – Nichole Foster	214.665.7248
rodriguez.jose@epa.gov		foster.nichole@epa.gov	
CapDev – Amy Camacho	214.665.7175	Louisiana – Nancy Ho	214.665.3179
camacho.amy@epa.gov		ho.nancy@epa.gov	
Chemical Phase Rules – Kim Ngo-Kidd	214.665.7158	New Mexico – Angela Restivo	214.665.7123
ngo.kim@epa.gov		restivo.angela@epa.gov	
CCR – Nichole Foster	214.665.7248	Arkansas – Jatin Mistry	214.665.7483
foster.nichole@epa.gov		mistry.jatin@epa.gov	
Ground Water Rule – Dawn Ison	214.665.2162	Tribal – Kim Ngo-Kidd	214.665.7158
ison.dawn@epa.gov		ngo.kim@epa.gov	
Emergency Response – Dawn Ison	214.665.2162		
ison.dawn@epa.gov			
Lead /Copper – Shirley Mlachak	214.665.2267		
mlachak.shirley@epa.gov			
LT2 – Mark McCasland	214.665.8088		
mccasland.mark@epa.gov			
Operator Certification – Amy Camacho	214.665.7175		
camacho.amy@epa.gov			
Stage 2 DBPR – Nancy Ho	214.665.3179		
ho.nancy@epa.gov			
Radionuclides – Kim Ngo-Kidd	214.665.7158		
ngo.kim@epa.gov			
RTCR, SDWIS State – Andy Waite	214.665.7332		
waite.andrew@epa.gov			
SDWIS Fed – Shirley Mlachak	214.665.2267		
mlachak.shirley@epa.gov			
Source Water Protection – Nancy Ho	214.665.3179		
ho.nancy@epa.gov			
Surface Water Suite – Mark McCasland	214.665.8088		
mccasland.mark@epa.gov			